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June 2, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Final Phase I RFI/RI Workplan for OU 10 - Other Outside
Closures, May, 1992

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. The Division's comments as well as those of the EPA are attached.

Unfortunately, due to the large number of issues that remain to be resolved, the Division is withholding approval of the Workplan. Significant problems still exist with the ability of the Field Sampling Plan (FSP) to support RCRA Closure, collect surficial soil samples that are useful to this RFI/RI and consistent with other programs on plantsite, and effectively use the HPGe instrument on small IHSSs. In addition, discussions must occur between DOE, EPA and the Division on the appropriate scope of the Phase I RFI/RI for IHSS 129.

These issues, comments, and concerns should be addressed by DOE by July 1, 1992 and an approvable Workplan submitted on that date. If this does not occur, DOE will be in violation of the IAG and may be liable for stipulated penalties that will accrue from May 1, 1992, the date that an approvable document was to be submitted.

Revision of this Workplan can be accomplished by submitting updated replacement pages, figures, and tables or entire sections, as appropriate. There is no need to resubmit the entire Workplan.

ADMIN RECORD

A-OU10-000031

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

A handwritten signature in cursive script, reading "Gary W. Baughman".

Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Daniel S. Miller, AGO
Martin Hestmark, EPA
Bruce Thatcher, DOE
Farrel Hobbs, EG&G
Lee Sobchak, EG&G
Barbara Barry, RFPU